

1           **BOIES SCHILLER FLEXNER LLP**  
2       William A. Isaacson (admitted *pro hac vice*)  
3       Nicholas A. Widnell (admitted *pro hac vice*)  
4       Stacey K. Grigsby (admitted *pro hac vice*)  
5       1401 New York Avenue, NW  
         Washington, DC 2005  
4       Phone: (202) 237-2727/Fax: (202) 237-6131  
         wisaacson@bsfllp.com  
5       nwidnell@bsfllp.com  
         sgrigsby@bsfllp.com

*(Additional counsel appear on signature page)*

8 Attorneys for Defendant Zuffa, LLC,  
*d/b/a Ultimate Fighting Championship and UFC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury, on behalf of themselves and all others similarly situated,

Lead Case No.: 2:15-cv-01045-RFB-(PAL)

**[PROPOSED] STIPULATED  
DISCOVERY PLAN AND SCHEDULING  
ORDER**

## Plaintiffs,

V.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

On June 14, 2017, the Court entered a Discovery Plan and Scheduling Order (“Scheduling Order”) setting deadlines through dispositive motions (ECF No. 432). On October 24, 2017, the parties met and conferred and agreed that, due to circumstances outside of Defendant Zuffa, LLC’s control, an adjustment was needed to the Scheduling Order to extend the timeline for expert discovery, which would also require a minimal shift in the remaining deadlines in the Scheduling Order. No deadlines are extended more than 30 days, and all of the deadlines after Rebuttal Expert Reports are extended only one week. The parties have stipulated to the following deadlines:

Opposition Expert Reports other than response to Dr. Zimbalist	October 27, 2017
Opposition Expert Report in response to Dr. Zimbalist	November 15, 2017
Last Day to Depose Opposition Experts	December 8, 2017
Rebuttal Expert Reports	January 12, 2018
Last Day To Depose Plaintiffs' Rebuttal Experts	January 24, 2018
Daubert Motions	February 2, 2018
Class Certification Motion	February 2, 2018
Daubert Opposition Briefs	March 23, 2018
Class Certification Opposition Brief	March 23, 2018
Daubert Reply Briefs	April 23, 2018
Class Certification Reply Brief	May 15, 2018
Class Certification Hearing	Court's Convenience
Summary Judgment Motions	July 16, 2018
Summary Judgment Opposition Briefs	August 15, 2018
Summary Judgment Reply Briefs	September 14, 2018

## IT IS SO ORDERED:

By: Tygg A. Teer

DATED: November 3, 2017

1  
2 DATED: October 25, 2017

/s/ Eric L. Cramer

3 BERGER & MONTAGUE, P.C.  
4 Eric L. Cramer (admitted *pro hac vice*)  
5 Michael Dell'Angelo (admitted *pro hac vice*)  
6 Patrick Madden (admitted *pro hac vice*)  
7 Mark R. Suter (admitted *pro hac vice*)  
8 1622 Locust Street  
9 Philadelphia, PA 19103  
Phone: (215) 875-3000/Fax: (215) 875-4604  
ecramer@bm.net  
mdellangelo@bm.net  
pmadden@bm.net  
msuter@bm.net

10 COHEN MILSTEIN SELLERS & TOLL, PLLC  
11 Benjamin D. Brown (admitted *pro hac vice*)  
12 Richard A. Koffman (admitted *pro hac vice*)  
13 Dan Silverman (admitted *pro hac vice*)  
14 1100 New York Ave., N.W., Suite 500, East Tower  
Washington, DC 20005  
Phone: (202) 408-4600/Fax: (202) 408 4699  
bbrown@cohenmilstein.com  
rkoffman@cohenmilstein.com  
dsilverman@cohenmilstein.com

16 Joseph R. Saveri (admitted *pro hac vice*)  
17 Joshua P. Davis (admitted *pro hac vice*)  
18 Kevin E. Rayhill (admitted *pro hac vice*)  
19 Jamie Chen (admitted *pro hac vice*)  
555 Montgomery Street, Suite 1210  
San Francisco, California 94111  
Phone: (415) 500-6800/Fax: (415) 395-9940  
jsaveri@saverilawfirm.com  
jdavis@saverilawfirm.com  
krayhill@saverilawfirm.com  
jchen@saverilawfirm.com

20  
21  
22 *Co-Lead Counsel for the Classes and Attorneys  
for Individual and Representative Plaintiffs Cung  
Le, Nathan Quarry, Jon Fitch, Luis Javier  
Vazquez, Brandon Vera, and Kyle Kingsbury*

23  
24  
25 WOLF, RIFKIN, SHAPIRO,  
26 SCHULMAN & RABKIN, LLP  
27 Don Springmeyer (Nevada Bar No. 1021)  
Bradley S. Schrager (Nevada Bar No. 10217)  
3556 E. Russell Road, Second Floor

1 Las Vegas, Nevada 89120  
2 (702) 341-5200/Fax: (702) 341-5300  
3 dspringmeyer@wrslawyers.com  
bschrager@wrslawyers.com  
jjones@wrslawyers.com

4 *Liaison Counsel for the Classes and Attorneys for*  
5 *Individual and Representative Plaintiffs Cung Le,*  
6 *Nathan Quarry, Jon Fitch, Luis Javier Vazquez,*  
*Brandon Vera, and Kyle Kingsbury*

7 WARNER ANGLE HALLAM JACKSON &  
8 FORMANEK PLC  
9 Robert C. Maysey (admitted *pro hac vice*)  
Jerome K. Elwell (admitted *pro hac vice*)  
2555 E. Camelback Road, Suite 800  
Phoenix, AZ 85016  
Phone: (602) 264-7101/Fax: (602) 234-0419  
rmaysey@warnerangle.com  
jelwell@warnerangle.com

12 LAW OFFICE OF FREDERICK S. SCHWARTZ  
13 Frederick S. Schwartz (admitted *pro hac vice*)  
15303 Ventura Boulevard, #1040  
14 Sherman Oaks, CA 91403  
15 Phone: (818) 986-2407/Fax: (818) 995-4124  
fred@fredschwartzlaw.com

16 SPECTOR ROSEMAN KODROFF & WILLIS,  
17 P.C.  
18 Eugene A. Spector (admitted *pro hac vice*)  
Jeffrey J. Corrigan (admitted *pro hac vice*)  
William G. Caldes (admitted *pro hac vice*)  
19 1818 Market Street – Suite 2500  
Philadelphia, PA 19103  
20 Phone: (215) 496-0300/Fax: (215) 496-6611  
espector@srgw-law.com  
jcorrigan@srgw-law.com  
wcaldes@srgw-law.com

22 *Additional Class Counsel and Attorneys for*  
23 *Individual and Representative Plaintiffs Cung Le,*  
24 *Nathan Quarry, Jon Fitch, Luis Javier Vazquez,*  
*Brandon Vera, and Kyle Kingsbury*

1  
2 DATED: October 25, 2017

3 /s/ Stacey K. Grigsby

---

4  
5  
6  
7  
8 BOIES SCHILLER FLEXNER LLP  
William A. Isaacson (admitted *pro hac vice*)  
Nicholas A. Widnell (admitted *pro hac vice*)  
Stacey K. Grigsby (admitted *pro hac vice*)  
1401 New York Avenue, NW  
Washington, DC 20005  
Phone: (202) 237-2727/Fax: (202) 237-6131  
[wisaacson@bsflp.com](mailto:wisaacson@bsflp.com)  
[nwidnell@bsflp.com](mailto:nwidnell@bsflp.com)  
[sgrigsby@bsflp.com](mailto:sgrigsby@bsflp.com)

9  
10 CAMPBELL & WILLIAMS  
Donald J. Campbell (Nevada Bar No. 1216)  
J. Colby Williams (Nevada Bar No. 5549)  
700 South 7th Street  
Las Vegas, Nevada 89101  
Phone: (702) 382-5222/Fax: (702) 382-0540  
[djc@campbellandwilliams.com](mailto:djc@campbellandwilliams.com)  
[jcw@campbellandwilliams.com](mailto:jcw@campbellandwilliams.com)

11  
12  
13  
14 *Attorneys for Defendant Zuffa, LLC, d/b/a*  
*Ultimate Fighting Championship and UFC*

## **ATTESTATION OF FILER**

The signatories to this document are myself and Eric Cramer, and I have obtained Mr. Cramer's concurrence to file this document on his behalf.

Dated: October 25, 2017

/s/ Stacey K. Grigsby

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that service of the foregoing **Discovery Plan and Scheduling Order** was served on October 25, 2017 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Stacey K. Grigsby

Stacey K. Grigsby